

STIPULATION & PROPOSED ORDER FOR CASE MANAGEMENT SCHEDULE
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WHEREAS counsel for the parties have met and agreed upon the proposed case management schedule detailed below;

IT IS HEREBY STIPULATED AND AGREED that the following case management schedule shall govern this case:

1. Fact discovery shall end on September 30, 2008;
2. Expert disclosures shall be hand-delivered by October 6, 2008;
3. Rebuttal expert disclosures shall be hand-delivered by October 22, 2008;
4. Expert discovery shall end on November 5, 2008;
5. All dispositive motions shall be hand-delivered by November 5, 2008;
6. Opposition papers on dispositive motions shall be hand-delivered by November 14, 2008;
7. Reply papers on dispositive motions shall be hand-delivered by November 19, 2008;
8. Dispositive motions shall be heard on November 21, 2008; and
9. The joint pretrial conference statement shall be filed by November 25, 2008

Dated: August 29, 2008
Oakland, California

JUSTICE FIRST, LLP
Attorneys for Plaintiff Abhinav Bhatnagar
By:

/s/
Jenny C. Huang
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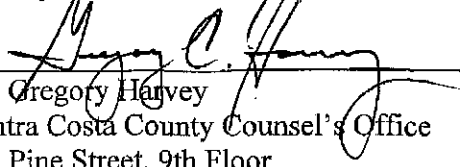
Dated: August 29, 2008
Walnut Creek, California

MCNAMARA, DODGE et al.
Attorney for Defendant Jason Ingrassia
By:

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Dated: August 29, 2008
Martinez, California

GREGORY HARVEY
Attorney for Contra Costa County and
the City of San Ramon

By: 
Mr. Gregory Harvey
Contra Costa County Counsel's Office
651 Pine Street, 9th Floor
Martinez, CA 94553

IT IS SO ORDERED.

Dated: August __, 2008

MAGISTRATE JUDGE ELIZABETH LAPORTE

JUSTICE FIRST, LLP